

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: RUDY D. ARNOLD : CHAPTER 13
: :
: Debtor : NO. 17j13408-kf

DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF WELLS FARGO

Debtor, by and though Joseph F. Claffy, Esquire, his attorney, contests the Motion for Relief sought by Movant and in support thereof avers the following:

1. Admitted.
2. Admitted.
3. Denied. Debtor does not know who owns the mortgage, believes Movant may only be the servicer thereof rather than the creditor and therefore denies such demanding strict proof.
4. Denied for the reasons stated in the answer directly above which is incorporated.
5. Denied. The property is worth over \$350,000 and the first mortgage balance of movant, or its ilk, is under \$60,000; therefore the chronic inclusion of such allegation of lack of protection without any apparent investigation is highly improper.
6. Admitted.
7. Denied. Debtor has no idea of what was intended and must deny.
8. Denied. Debtor has attempted tender of payment but such has been refused.
9. Denied. Debtor is in negotiation with other lienholders to complete a short sale of the property and such would cure any alleged defaults.
10. Admitted.
11. Denied that nny cause or allegation thereof has been pled or raised to justify or permit the waiving of any bankruptcy rule. .

Respectfully submitted:

/s/ Joseph F. Claffy
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